

SHER TREMONTE LLP

January 3, 2025

BY ECF

The Honorable Analisa Torres
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *Graves v. Combs et al.*, 24-cv-07201

Dear Judge Torres:

We represent Defendants Sean Combs, Daddy’s House Recordings, Inc., CE OpCo, LLC d/b/a Combs Global f/k/a Combs Enterprises LLC, Bad Boy Entertainment Holdings, Inc., Bad Boy Productions Holdings, Inc., Bad Boy Books Holdings, Inc., Bad Boy Entertainment LLC, and Bad Boy Productions LLC (together, the “Combs Defendants”) in the above-referenced case. We write, pursuant to Rule I.C of Your Honor’s Individual Rules and with the consent of all parties, to respectfully request certain modifications to the existing case schedule.

First, in light of the Court’s order (issued earlier today) granting Plaintiff’s request for permission to file an amended complaint, ECF No. 43, the Combs Defendants respectfully request that their deadline to respond to Plaintiff’s complaint be adjourned until twenty-one (21) days after the filing of Plaintiff’s contemplated amended complaint. This is the Combs Defendants’ first request to modify this deadline. This extension will not affect any other scheduled dates and all parties consent to it.

Second, the Combs Defendants respectfully request that the Civil Case Management Plan and Scheduling Order entered by the Court on December 16, 2024 (ECF Doc. No. 41) be modified to provide that the end of fact discovery and all party depositions be deferred until sixty (60) days after the conclusion of Mr. Combs’ criminal trial, which is scheduled to commence before the Hon. Arun Subramanian in this district on May 4, 2025. Pursuant to the operative Civil Case Management Plan and Scheduling order, all party depositions are presently scheduled to be completed by April 11, 2025. ECF No. 41, ¶ 6(a). Given the unique complexities and exceptional circumstances resulting from Mr. Combs’ approaching criminal trial and the many civil cases that have been filed against him and his affiliates in this district and elsewhere, the parties agree that good cause exists to defer all party depositions until after the criminal trial. We likewise request a corresponding extension of the expert discovery deadline from May

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23, 2025 (*i.e.*, six (6) weeks from the operative fact discovery deadline) until six (6) weeks from the adjourned fact discovery deadline. This is our first request to modify the Civil Case Management Plan and Scheduling Order.¹

We thank the Court for its consideration.

Respectfully submitted,

/s/ Erica A. Wolff

Erica A. Wolff
Michael Tremonte
Katie Renzler

cc: All Counsel of Record via ECF

¹ We respectfully note that in a similar civil action filed against Mr. Combs several months before this case, the Honorable Jessica G. L. Clarke today entered a Civil Case Management Plan and Schedule Order deferring depositions and the end of all fact discovery in that case until 90 days after the conclusion of Mr. Combs' criminal trial in light of the unique complexities and exceptional circumstances resulting from Mr. Combs' approaching criminal trial. *See Kane v. Combs et al.*, 23 Civ. 10628-JGLC (S.D.N.Y.), ECF No. 80.